
**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANGELINA KHARCHENKO	:	
PLAINTIFF,	:	CIVIL ACTION –LAW
	:	
v.	:	JURY TRIAL DEMANDED
	:	
WT RAND TRANSPORT, LLC	:	
	:	NO: 2:22-CV-01421-CDJ
AND	:	
	:	
WT RAND LOGISTICS, LLC	:	
	:	
DEFENDANTS.		

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

AND NOW COMES, Petitioner, Edward J. Ciarimboli, Esquire, on behalf of Fellerman & Ciarimboli Law, P.C. to file the instant Motion for Leave to Withdraw as Counsel for Plaintiff, Angelina Kharchenko, and avers as follows:

1. Petitioner, Edward J. Ciarimboli, Esquire is a Partner at Fellerman & Ciarimboli Law, P.C., located at 183 Market Street, Suite 200, Kingston, Luzerne County, PA 18704.

2. Plaintiff, Angelina Kharchenko, is a competent adult individual who resides at 400 East Street Road, Apt. 137, Feasterville, Bucks County, Pennsylvania 49053.

3. The action arises out of a commercial motor vehicle accident that occurred on October 15, 2020 in Bucks County, Pennsylvania.

4. On September 23, 2021, Plaintiff and Fellerman & Ciarimboli Law, P.C., entered into a Contingent Fee Agreement through which Plaintiff agreed that she would be represented by Fellerman & Ciarimboli Law, P.C. who would pursue claims for the injuries and damages that Ms. Kharchenko sustained as a result of the October 15, 2020 accident.

5. On February 20, 2023, Plaintiff sent an email to Fellerman & Ciarimboli, PC, advising that the Firm was discharged and stating that she had chosen Michael J. O'Neill, Esquire to represent her in this matter.

6. On information and belief, Mr. O'Neill intends to file a Notice of Appearance in this matter.

7. Pursuant to Pennsylvania Rule of Professional Conduct 1.16(a)(3), a lawyer "shall withdraw from the representation of a client if the lawyer is discharged."

WHEREFORE, the undersigned counsel requests that this Honorable Court grant his Motion for Leave To Withdraw as Counsel for Plaintiff in this matter.

Respectfully submitted,

FELLERMAN & CIARIMBOLI LAW, P.C.



By: _____
Edward J. Ciarimboli, Esquire

Date: February 24, 2023

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WT RAND TRANSPORT, LLC	:	
	:	NO: 2:22-CV-01421-CDJ
AND	:	
	:	
WT RAND LOGISTICS, LLC	:	
	:	
DEFENDANTS.		

CERTIFICATE OF SERVICE

I, Edward J. Ciarimboli, Esquire hereby certify that on the 24th day of February 2023, a true and correct copy of Petitioner’s Motion for Leave to Withdraw as Counsel was served electronically via CM/ECF system to the following participants in this case:

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FELLERMAN & CIARIMBOLI LAW, P.C.



By: _____
Edward J. Ciarimboli, Esquire